

CCP EnviroNews

September 2001

Environmental News from Cook Composites and Polymers' Saukville Facility

Welcome to CCP EnviroNews

This is the first edition of what we hope will be a regular newsletter. Why are we sending this to you? CCP is embarking on a long-term process to improve its environmental performance and we think it's important to share information with our neighbors and the Saukville community as we move forward. Over the next several years, we anticipate new developments relating to CCP's environmental programs and performance. It is our intention to share these with you in this newsletter.

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Survey Provides Important Information on Community Attitudes about CCP

Last year, CCP distributed a community survey to help us understand public attitudes as we move forward with major process changes and develop an environmental management system at the Saukville facility. The survey provided many interesting and useful results, which we summarize here.

42% think "CCP is a good environmental citizen," 46% think "CCP's environmental performance is OK but it could improve" and 9% think "pollution from CCP is a major threat to public health and the environment."

Those who have lived here a shorter time think the facility's environmental performance is better than those who have lived here longer. Those who live or work within a block rate CCP's environmental performance worse than those located ½ mile or more away.

72% think CCP's Saukville facility is being run cleaner, 12% that the facility is being run less clean and 7% that it's about the same as before CCP owned it.

22% don't notice any odors from the plant, 48% detect a slight odor, 13% think odors are common, 11% think odors are both "common and annoying" and 6% think odors are "constant and overpowering." Those living in the area longer, as well as those located within a block of CCP, are more concerned about odors.

14% indicated they know which chemicals are used or emitted by CCP and 86% indicated they do not. 66% want to know more about the chemicals used and 91% want to know if these chemicals pose a health threat.

When it comes to concerns relating to chemical spills, air and water pollution, hazardous waste, explosions or fire hazards at the CCP facility, 60% are concerned about all of these, with spills and air pollution of most concern.

Most (75%) believe CCP's environmental performance is similar to or better than those of other Saukville businesses. 65% believe CCP's performance is similar to or better than other chemical companies across the country.

About 2/3 think a CCP newsletter is a good idea and over ½ would like an annual meeting. Almost 1/3

think CCP should publicize its phone number and encourage people to call with their concerns.

60% are unsure about health risks from the CCP hazardous waste incinerator. There was an even split (1/3-1/3-1/3) on whether or not or maybe the incinerator creates a negative image of the village. Only 5% oppose closing the hazardous waste incinerator; about 1/2 favor closure and 40% need more information before deciding.

Community Advisory Committee Formed

In order to involve our neighbors and the community in our environmental protection efforts, CCP organized a Community Advisory Committee. The committee, which has quarterly meetings that are open to the public, gets updates on new CCP projects, regulatory issues and environmental performance. In return, committee members share their ideas on how to improve CCP operations and community outreach. Current committee members include:

Matt Geib—CCP employee
Charles Kroeger—plant neighbor
Dale and Denise Jacoby—plant neighbors
Sandra Garbarek—village president
Ann Lemons—village trustee
Steve Brachman—UW Extension
Chris Lear—village administrator
Jerry Dickmann—utility superintendent
Pat Brady—DNR SE Region
Tari Emerson—Charter Steel
Scott Jaeger—county board supervisor
Ray Meyer—plant neighbor
Bill Stolte—county emergency planning

In just its first two meetings, the Community Advisory Committee has provided valuable input by recommending:

- Recruitment of more plant neighbors to the committee.
- Improvements to CCP's environmental outreach plan.
- CCP establish a "repository" at the library for information relating to the cooperative environmental agreement with DNR and the community advisory committee.
- Advisory committee meetings will be open to the public and announced in the newspaper.

- DNR hold an informational meeting along with the public hearing on the cooperative environmental agreement and that they get information out to people before any future meetings.
- Ideas for CCP chemical fact sheets and newsletter topics.

At its May meeting, the committee discussed how CCP, the committee and the community can further resolve odor issues. Committee members who are plant neighbors indicated that problem odors occur infrequently and are not as bad as they used to be. Mike Lotman, plant manager, indicated that CCP's goal is zero odor complaints. The committee discussed the idea of seeking volunteers to keep detailed logs relating to odors they experience, communicating immediately with plant personnel and working together to try to identify the source of the odor and what can be done about it. CCP will present a more specific proposal on this to the committee.

Want more information on the DNR-CCP cooperative environmental agreement, CCP's Community Advisory Committee, last year's community survey or the CCP environmental outreach plan?

There is a CCP binder with lots of good information on these and related topics at the Saukville Public Library, 151 S. Main Street. (Telephone—284-6022)

What Goes on at CCP?

The CCP Saukville facility makes resins used in boats, cars and shower enclosures among others. This facility began resin production in 1949 and was purchased by CCP in 1990. We currently produce approximately 52 million pounds of resin a year. Wastes generated at the facility are primarily reaction water, spent solvents, filter cleaning residues, and off-spec materials. We routinely

provide information on emissions and waste generation to the DNR. CCP also operates a thermal oxidizer, installed in 1997, that destroys toxic air emissions from CCP production processes.

The CCP Saukville facility generates approximately 5 million pounds annually of a hazardous waste known as “reaction water”, a by-product of resin production. The plant also produces about 1.7 million pounds of spent solvent each year that is used as a supplemental fuel in the hazardous waste incinerator, which is used to burn the reaction water.

CCP recognizes the economic, environmental, and community benefits of moving toward waste minimization and pollution prevention options for management of its hazardous wastes, as an alternative to hazardous waste incineration. The challenge is to synchronize CCP’s evaluation of these options with the regulatory requirements and review of DNR and U.S. EPA staff from many different environmental programs. Among these requirements are the reissuance of CCP’s hazardous waste treatment and storage license and meeting the Clean Air Act’s standards for hazardous air pollutants. Requirements of the Clean Water Act would also potentially be applied to any wastewater discharges from the facility.

In 1999, CCP contacted the Wisconsin DNR, to indicate our interest in an Environmental Cooperative Agreement to help facilitate our waste minimization project and we were accepted into the program later that year.

Environmental Agreement with DNR

The Environmental Cooperative Agreement provides the framework for CCP and DNR to evaluate the feasibility of eliminating the need to incinerate five million pounds of hazardous waste annually. Specifically, CCP commits to cease burning hazardous waste in its incinerator by September 30, 2001. The agreement includes a timeline for CCP to implement our waste minimization project and make the transition away from burning hazardous wastes. As part of this agreement, CCP also commits to establish an environmental management system, and seek other opportunities for pollution prevention, product stewardship and other environmental benefits at our

Saukville facility in cooperation with our neighbors, customers, the local community and DNR.

As part of our commitment to “superior environmental performance,” CCP will go beyond what would otherwise be required by DNR by setting the following goals for the Saukville facility:

1. Through waste minimization, eliminate or significantly reduce the wastes currently burned in the hazardous waste incinerator.
2. Establish a long-term reduction program for wastes generated and pollutants released, giving priority to those of highest health and environmental concern
3. Continuously improve our practices to minimize environmental impacts and conserve natural resources.
4. Integrate health, safety and environmental considerations into the design, development and improvement of our products. Encourage continued stewardship in the use and disposal of these products by our customers.

Approximately 30 people attended a DNR public informational meeting on the agreement on March 22, 2001 and others sent written comments. A transcript of the meeting is available at <http://www.dnr.state.wi.us/org/caer/cea/ecpp/agreements/cook/index.htm> and at the Saukville library. Highlights of the comments include:

◆ *“More neighbors should be added to the advisory committee and the meetings should be open to the public. More information should be available at the library repository.”*

◆ *“The DNR public notice, public meeting, availability of information and response to input are inadequate.”*

◆ *“Those near the plant would receive reduced protection if the incinerator is less strictly regulated. CCP is avoiding new air standards for heavy metals without removing them from the waste.”*

◆ Most indicated that past odors from Freeman Chemical were worse than they are now. Current odor concerns are episodic, especially on Church Street (“burns your eyes and throat”).

◆ Several people believe the proposed agreement allows CCP to discharge its high strength waste to the Saukville treatment plant.

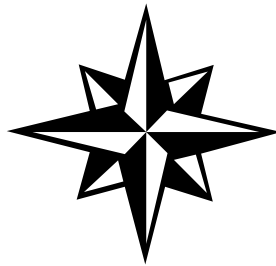
◆ Several expressed confusion about the waste minimization project and how the proposed agreement affects it. One commented “*no waste minimization would actually occur with the project.*”

◆ “*Waste solvents provide good fuel for the incinerator so why would CCP replace them with expensive natural gas?*” One commented that “*the amount of xylene recovered will be small and of questionable quality—reusing this would be risky*

and uneconomical. Hazardous waste incineration is a known, effective technology, while the MPPE technology is unproven. CCP should be required to recover glycol as part of the agreement.”

Concerns were also expressed relating to impacts on garden and health, noise, groundwater contamination, energy use and conservation.

The DNR is preparing a summary of the comments, their responses to and how the agreement will be changed. CCP hopes that this Agreement will eventually lead to increased trust among CCP, the public, and DNR; reduce the amount of time spent by CCP and DNR on administrative tasks that have no direct environmental benefit, and serve as a model for other companies.



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